

Michael Krinsky (MK4503)  
Eric M. Lieberman (EL 4822)  
RABINOWITZ, BOUDIN, STANDARD,  
KRINSKY & LIEBERMAN, P.C.  
111 Broadway, 11<sup>th</sup> Floor  
New York, New York 10006  
Telephone: (212) 254-1111  
Facsimile: (212) 674-4614

**Terry Gross (TG 3249)**  
**GROSS BELSKY ALONSO LLP**  
**180 Montgomery Street, # 2200**  
**San Francisco, California 94104**  
**Telephone: (415) 514-0200**  
**Facsimile: (415) 544-0201**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E.T.I. EURO TELECOM  
INTERNATIONAL, N.V.,

Plaintiff,

V.

REPUBLIC OF BOLIVIA, and EMPRESA NACIONAL  
DE TELECOMUNICACIONES ENTEL, S.A.,

Defendants.

: Case No. 08-cv-4247 (LTS)(FM)

**NOTICE OF MOTION FOR COSTS, ATTORNEY'S FEES AND DAMAGES**

PLEASE TAKE NOTICE that Empresa Nacional De Telecomunicaciones Entel, S.A. (“ENTEL”) herewith moves the Court, the Honorable Laura Taylor Swain, Presiding, at the United States Courthouse, 500 Pearl Street, New York, New York, for an award of costs, attorney’s fees and damages pursuant to N.Y. C.P.L.R. § 6212 and the Court’s Memorandum Opinion and Order dated July 30, 2008, as follows:

For costs through August 22, 2008: \$58,091.23

For attorney's fees through August 22, 2008: \$637,743.20

For damages through August 20, 2008: \$646,769.04

Total through the respective dates: \$1,342,603.47; and,

*in addition* (a) an award for any costs and attorney's fees that ENTEL may incur subsequent to August 22, 2008 through the date on which ENTEL's attached funds are returned to it or final judgment dismissing this action is entered, whichever is earlier; and (b) for the period subsequent to August 20, 2008 through the date on which the attached funds are returned to ENTEL or final judgment is entered, whichever is earlier, an award for additional damages under the same measure of damages used by ENTEL in calculating damages through August 20, 2008.

In support, ENTEL relies upon the accompanying declaration of Michael Krinsky, Esq., dated August 22, 2008; the accompanying memorandum of law; and all the prior papers and proceedings herein.

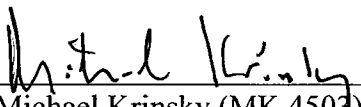
Under the Court's Memorandum Opinion and Order dated July 30, 2008, plaintiff's response to this motion is due no later than September 5, 2008.

Dated: August 25, 2008

Of Counsel:

Jules Lobel

Adam Belsky  
GROSS BELSKY ALONSO LLP

  
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KRINSKY & LIEBERMAN, P.C.

Terry Gross (TG 3249)  
GROSS BELSKY ALONSO LLP

*Counsel for Empresa Nacional de  
Telecomunicaciones Entel S.A.*

TO:

Robert L. Sills  
Steven J. Fink  
Orrick, Herrington & Sutcliffe LLP  
666 Fifth Avenue  
New York, New York 1010  
Telephone: (212) 506-5000  
Facsimile: (212) 506-5151  
*Counsel for Plaintiff*

Ronald E.M. Goodman  
Paul S. Reichler  
Janis H. Brennan  
1875 K Street, N.W.  
Washington, D.C. 20006  
Telephone: (202) 223-1200  
Facsimile: (202) 785-6687  
*Counsel for Defendant Republic of Bolivia*